

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

PETER TAM and BEVERLY CHIN-TAM,

Plaintiffs,

v.

JUN HAI CHEN

Defendant

Case No. 1:25-cv-10484-DJC

**DECLARATION OF PETER TAM IN SUPPORT OF PLAINTIFFS' REQUEST FOR  
DEFAULT JUDGMENT PURSUANT TO FED.R.CIV.P. 55(b)(1)**

Pursuant to 28 U.S.C. § 1746, the undersigned deposes and states as follows:

1. I, Peter Tam, am a Plaintiff in this matter. I am submitting this declaration in support of the request for default judgment brought on behalf of myself and my wife, Plaintiffs.
2. I verify, on my personal knowledge, that all of the factual allegations asserted in the Amended Complaint, ECF No. 5, are true and correct.
3. The Defendant, Jun Hai Chen, is not a minor. He is an adult male, close to 40 years of age, with whom I have dealt on numerous occasions as detailed in the Amended Complaint.
4. The Defendant, Jun Hai Chen, is not an incompetent person. Through my personal experience in numerous dealings with him, he has his full mental faculties.
5. The Defendant, Jun Hai Chen, to the best of my knowledge, is not an active-duty member of the military. He is an entrepreneur with whom I have had multiple business dealings as detailed in the Amended Complaint.

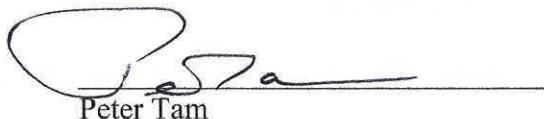
6. As alleged in Paragraphs 36, 37, 44, 47, 49, 50, 52, 71, 73 and 74 of the Amended Complaint, the Defendant, Mr. Chen, knowingly and willfully strung my wife and me along, to lead us on to believe that he would be repaying the \$250,000 owed to us, even though he had no intention of doing so. He made multiple promises directly to me, to my face, that he would repay us this money owed, he directly handed me two post-dated checks with insufficient funds in connection with a dinner meeting that we had at the Encore casino in Everett, Massachusetts, and he sent text messages to me in writing confirming that he owed this money, which he always said would be repaid imminently. He has not repaid this \$250,000, and these statements were false, particularly when he has always known the extent of his own resources to be able to repay us or not, even when constantly promising that he would do so but never actually doing it.

7. My wife and I have been forced to sue Mr. Chen to recover the amounts that he owes us, in this lawsuit, and we have had to pay legal fees, as to which my attorney is separately submitting the invoices, accompanying his own declaration.

8. I am disappointed by this struggle to have Mr. Chen simply pay my wife and me what he owes us, which has been going on for several months now. I simply want this matter to end with Mr. Chen reimbursing our necessary legal fees, costs, and interest, and paying us the \$250,000 that he owes us, trebled to \$750,000 as we are entitled under the claim we have made.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 24, 2025.



Peter Tam

**CERTIFICATE OF SERVICE**

I, Matthew A. Gens, hereby certify that on April 24, 2025, a true and correct copy of this document filed through the ECF system has been sent by USPS Priority Mail to the Defendant, at his residential address, as follows:

Jun Hai Chen  
28425 Fox Hollow Dr.  
Hayward, CA 94542

/s/ Matthew A. Gens  
Matthew A. Gens